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February 21, 2017

Via ECF ONLY
Honorable J. Paul Oetken
United States District Judge
United States District Court
Southern District of New York
40 Foley Square, Room 2101
New York, NY 10007

Re: Guang Ping Zhu v. Salaam Bombay, Inc., et al.
United States District Court, SDNY, Index No. 16-cv-04091

Dear Hon. J. Paul Oetken,

Please be advised that the undersigned's firm of Wood, Smith, Henning & Berman, LLP, represents the defendants in the above-referenced civil action. We write to respectfully request that the deadline to file a motion for summary judgment in this matter be extended until after the parties have had the opportunity to attend a settlement conference. Counsel for the plaintiff does not object to this request.

The current deadline to file a motion for summary judgment is today, February 21, 2017. We expect a settlement conference will be schedule over the next two to three months and, as such the instant request should not impact the bench trial in this matter, scheduled for July 17 and July 18, 2017. This is the parties' first request for such an extension.

Counsel for all parties remain available should Your Honor require additional information regarding this submission. Thank you for your time and attention to this matter.

Respectfully Submitted,

Heather C. Hili

Heather C. Hili, Esq.

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